

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

CAMERON MCCADDEN, a minor, by  
his next friend, CHRYSTAL  
MCCADDEN

Case No. 2:18-cv-12377-DPH-MKM  
Hon. Denise Page Hood

Plaintiff,

v.

CITY OF FLINT, et al.,

Defendants.

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**PLAINTIFF'S MOTION FOR APPROVAL OF SETTLEMENT,  
ATTORNEYS FEES AND COSTS AND TO AUTHORIZE  
DISBURSEMENTS**

NOW COMES Plaintiffs by and through their attorneys, and for her Motion for Approval of Settlement, Attorneys Fees and Costs and to Authorize Disbursements states as follows:

1. That this is a 1983 case involving a disabled minor.
2. Plaintiff, a disabled individual, was restrained at school with handcuffs.
3. A settlement has been reached with all parties.
4. The law firms representing the Plaintiffs expended certain monies and time in pursuing this matter for which are entitled to reimbursement for pursuant to their Contingency Fee Agreement. Those amounts will be presented at the hearing.

5. It is in Cameron's best interest to place the settlement proceeds into a Supplemental Needs Trust for his benefit to protect said benefits.

6. Plaintiff requests authority to establish a Supplemental Needs Trust for the benefit of Cameron McCadden as Grantor and Trustee pursuant to the Michigan Bridges Eligibility Manual (BEM) Sec. 401 which authorizes her as legal guardian to establish the Trust.

7. The Supplemental Needs Trust, which complies with 42 U.S.C section 1396p(d)(4)(A), would initially be funded with the settlement proceeds and would be supervised by the Genesee County Probate Court with Annual Accountings to be filed.

8. That in addition to the Plaintiff attorney's fees and costs, the Plaintiff has separately hired a probate attorney to administer and handle the probate proceedings and the trust. That attorney fee and costs will also need to be approved.

9. That the attorneys' fees and costs should be approved by this Honorable Court and disbursement authorized.

10. That this Honorable Court should approve the settlement.

11. That the balance of funds will be placed into a structured settlement for the benefit of Plaintiff. The structured settlement will be presented at the hearing.

12. That this Honorable Court should authorize distribution to the interested parties.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court enter an Order Approving Settlement, Attorneys Fees and Costs and to Authorize Disbursements.

Respectfully submitted,

*/s/ Jonathan R. Marko*  
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Dated: June 12, 2020

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2020, I presented the foregoing paper to this Court's MiFile System which will send notification of such filing to the above listed attorneys of record.

*/s/ Marissa A. Williams*